

RE: EPA Cement Creek FSP

Sabrina Forrest to: William Simon

10/21/2010 10:23 AM

From: Sabrina Forrest/R8/USEPA/US

To: "William Simon" <wsimon@frontier.net>

Cc: "Steve Fearn" <fearneng@rmi.net>, "Peter Butler " <pbutler@wildblue.net>, megan_dudevoir@urscorp.com, andrew_longworth@urscorp.com, Bryan_Williams@urscorp.com

Hi Bill, I spoke with Peter regarding the fact that we both had not gotten your comments and Peter tried to let me know what he recalled yours involved. I have responded to them below. I am heading out of the office in a bit so that I make the ARSG meeting tonight. I plan to have 4 or 5 copies of the FSP; however, only 3 copies of the revised large figures could get made.

Sincerely,

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"William Simon" ---10/20/2010 07:50:26 PM---I'm sending this again; apparently Steve received it but Peter and Sabrina did not. Bill

From: "William Simon" <wsimon@frontier.net>

To: Sabrina Forrest/R8/USEPA/US@EPA

Cc: "Peter Butler " <pbutler@wildblue.net>, "Steve Fearn" <fearneng@rmi.net>

Date: 10/20/2010 07:50 PM

Subject: RE: EPA Cement Creek FSP

I'm sending this again; apparently Steve received it but Peter and Sabrina did not. Bill

Sabrina, Quick review of the plan yielded the following comments:

1. I don't get it. In the problems etc. table it only identifies the Henrietta for sampling for PCB's. Same stated for section 6.3.3. The Gladstone area mines should be sampled for PCB's. Oh, I see table 3 has PCB's listed for the mine sites. THAT WAS A COMPLETE MISUNDERSTANDING. I TRIED TO EXPLAIN THAT WE HAVE SEEN PCB STAINED SOILS AT THE HENRIETTA, AND THAT THERE IS ANECDOTAL EVIDENCE OF PCB OIL CONTAINING EQUIPMENT HAVING BEEN USED IN THE MORE PRODUCTIVE MINES. START THOUGHT I WANTED TO FOCUS ON HENRIETTA. I CORRECTED THEM, TOLD THEM WE HAVE NO INTEREST IN CHARACTERIZING THAT DRAINAGE; OUR FOCUS STILL BEING THE SITES IN UPPER CEMENT CREEK ABOVE GLADSTONE. THE REVISED FSP FIXED ALL THAT AND HAD PCB ANALYSIS ADDED FOR WASTE/SOURCE SAMPLES AND ALL THE SEDIMENTS.

2. SW samples: shouldn't they be depth/width integrated at locations short distances from inflows where mixing is not complete? WHEN SAMPLING TO FILL DATA GAPS FOR THE HAZARD RANKING SYSTEM MODEL, WE NEED TO BIAS THE SW/SED SAMPLES. OUR OBJECTIVE IS NOT TO QUANTIFY THE AVERAGE ACROSS THE STREAM BANK TO BANK, BUT TO BIAS OUR CHARACTERIZATION OF WHAT IS COMING OFF A PARTICULAR SOURCE OR INFLOW OF INTEREST, SO WE FOCUS ON THE DEPOSITIONAL AREAS.

3. See my "comments" as tool edited comments plus additions/deletions. OK - IF THERE

4. TAL metals include antimony I guess but not Molybdenum of which WQCC recently has adopted standards. Shouldn't that be included? (thanks Peter!). WE ARE HAVING THE WHOLE TAL APPLIED; HOWEVER, I ASKED THE LAB COORDINATOR TO FOCUS ON MAKING SURE OUR REPORTING LIMITS (ESP. FOR Cd) WERE ADEQUATELY LOW FOR Al, Sb, As, Ba, Ca, Cu, Cd, Fe, Pb, Mg, Mn, Mo, Zn,

5. Will your contractor be taking these samples? Do you or they need the use of our lab or my office? YES, START WILL BE DOING THIS AND BIG THANKS!! - I AM SURE THAT THEY WILL NEED THE SPACE. HOW WOULD YOU LIKE TO COORDINATE GETTING THEM ACCESS TO YOUR SPACES?

6. Soil samples: these are just grabs? Or hopefully they are composited appropriately. I WAS NOT HAPPY WITH THE ONE SOLID SAMPLE ORIGINALLY SCHEDULED. START UPPEDED THOSE NUMBERS TO FIVE SAMPLES FOR MINE WASTE SOURCE AREAS. AN ARTIFACT OF THE HRS AGAIN....WE LIKELY WON'T COMPOSITE. WHEN THE SITE GETS SCORED, WE LOOK AT THE HIGHEST CONCENTRATION DETECTED IN SOURCES. WE COULD ANALYZE THEM ALL SEPARATELY AND ALSO SEND A COMPOSITE OFF FOR ANALYSIS, BUT IF A SITE DOES GET PROPOSED, REVIEWERS AND COMMENTERS WANT TO KNOW WHAT CONCENTRATION IS ASSOCIATED WITH WHAT INDIVIDUAL SAMPLE.

7. The maps have several inaccuracies but not related to the sample plan. I saw a few in the text as well but only in the boiler plate and/or historical review sections - nothing that important that I saw. WILL IT BE OKAY IF WE NOTE AND MAKE THE CORRECTIONS IN OUR SAMPLING ACTIVITIES REPORT AND THE ANALYTICAL RESULTS REPORT?

Bill

-----Original Message-----

From: Forrest.Sabrina@epamail.epa.gov
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Sent: Thursday, October 14, 2010 4:38 PM
To: wsimon@frontier.net; fearneng@rmi.net; pbutler@wildblue.net;
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Barbara.Nabors@state.co.us; doug.jamison@state.co.us;
craig.gander@state.co.us
Subject: EPA Cement Creek FSP

All, Here is the Sampling Plan that the EPA contractor has put together for early November's event. This focuses on Cement Creek sources, surface water and sediments that all need to get characterized for CERCLA Site Assessment. Bill, I will let you determine if others from your larger stakeholder email list should get this too.

I need to have your review and comments completed by next week, preferably by Wednesday the 20th. I will send two larger maps separately.
(See attached file: Figure1SiteLocation_map.pdf) (See attached file: Upper Animas FSP text.doc)

Sincerely,

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[attachment "Upper Animas FSP text.doc" deleted by Sabrina Forrest/R8/USEPA/US]